

REMARKS

The following Amendment is being filed with a Request for Continued Examination (RCE). Therefore, entry of the Amendment is requested before further examination.

As amended, the apparatus of claim 1 recites a body to connect a first tubing section to a second tubing section. The body includes a first opening to receive the first tubing section to connect the first tubing section to the body and a second opening to receive the second tubing section to connect the second tubing section to the body.

Contrary to the limitations of independent claim 1, Springer discloses inner 21 and outer 22 strings. The Examiner appears to contend that Springer's outer string 22 is the purported body of claim 1. However, as now amended, claim 1 explicitly recites that the body connects first and second tubing sections together; and as such, the skilled artisan in possession of Springer would not have derived that the outer string 22 connects sections of the inner string 21 together. The Examiner does not rely on Roberts for these claim limitations. Therefore, Applicant submits that for at least the foregoing reasons, amended independent claim 1 overcomes the § 103 rejection as being unpatentable over Springer in view of Roberts.

For similar reasons, amended independent claims 97 and 101 overcome the § 103 rejections. In this regard, claim 97, as amended, recites a first body to connect first and second tubing sections together, where a first opening receives and connects the first tubing section to the first body and a second opening receives and connects the second tubing section to the first body. Likewise, as amended, the method of independent claim 101 recites providing a first opening in a body to receive a first tubing section to connect the first tubing section to the body; and providing a second opening in the body to receive a second tubing section to connect the second tubing section to the body.

Dependent claims 2, 3, 11, 12, 16, 18, 22, 99, 100, 102 and 103 are patentable for at least the same reasons as the claims from which they depend.

The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0238US).

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Respectfully submitted,
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